UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

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In re : Chapter 11

Rudolph W. Giuliani, : Case No. 23-12055 (SHL)

:

Debtors. :

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF NOTICES AND DOCUMENTS

PLEASE TAKE NOTICE that Winston & Strawn LLP hereby appears as counsel to Robert Hunter Biden in the above-captioned chapter 11 case. Pursuant to 11 U.S.C. § 1109(b) and Federal Rules of Bankruptcy Procedure 2002, 9007 and 9010(b), the undersigned respectfully requests that all notices given or required to be given in this case be given and served upon:

Timothy W. Walsh Abbe D. Lowell

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PLEASE TAKE FURTHER NOTICE that, pursuant to 11 U.S.C. § 1109(b), the foregoing request includes not only the notices and papers referred to in the Federal Rules of Bankruptcy Procedure specified above, but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint or demand, whether written or oral, formal or informal, and whether transmitted or conveyed by mail, hand delivery, facsimile transmission, e-mail, telephone, telegraph, telex or otherwise, which affects the above-captioned debtor or the property of or in the possession, custody or control of the Debtor or which is otherwise filed or given with regard to the above-referenced case.

PLEASE TAKE FURTHER NOTICE that neither this notice nor any later appearance, pleading, claim, or suit shall waive any right (1) to have final orders in non-core matters entered only after de novo review by a District Judge, (2) to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, or (3) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and Request for Service of Notices and Documents is without prejudice to Robert Hunter Biden's rights, remedies, claims, actions, defenses, setoffs, or recoupments, in law or in equity, against the Debtor either in this case or in any other action, all of which rights, remedies, claims, actions, defenses, setoffs and recoupments are expressly reserved.

PLEASE TAKE FURTHER NOTICE that pursuant to Federal Rule of Bankruptcy Procedure 3017(a), Robert Hunter Biden further requests that all plans and disclosure statements filed herein by any party be duly served upon the undersigned counsel.

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Dated: January 4, 2024 New York, New York

WINSTON & STRAWN LLP

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